

The Hon. John C. Coughenour

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALAN GOMEZ-MARENTES, *et al.*,

Defendants.

NO. CR20-092-JCC

**DECLARATION OF DEA TASK FORCE  
OFFICER LUKE BRANDEBERRY  
IN SUPPORT OF MOTION FOR  
PROTECTIVE ORDER RESTRAINING  
CERTAIN FORFEITABLE PROPERTY**

I, Luke Brandeberry, declare and say:

1. I am a Task Force Officer (“TFO”) of the Drug Enforcement Administration (“DEA”), currently assigned to the Tacoma Resident Office, located within the Seattle, Washington, Field Division. As such, I am an investigative or law enforcement officer of the United States, within the meaning of Section 2510(7) of Title 18, United States Code, and am empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code. I have been a TFO since February 2019. I am a commissioned law enforcement officer of the Kent Police Department. I have a total of 12 years' experience as a police officer. During my time as a police officer, I have worked uniformed patrol, as well as plain clothes investigations. As a detective with the Kent Police Department Special Investigations Unit and a TFO with the DEA, I have participated in hundreds of

1 investigations that involved drug-related offenses. These cases involved the use of  
2 undercover agents and confidential sources to investigate the trafficking of  
3 methamphetamine, heroin, cocaine, ecstasy, firearms, and various abused prescription  
4 drugs. In many of these cases, I acted as the case agent, confidential source handler,  
5 and/or undercover purchaser.

6         2. I am a graduate of McDaniel College, and hold a bachelor's degree in  
7 Sociology with emphasis in Criminal Justice. In 2007, I completed a six-month entry-  
8 level police academy in Montgomery County, Maryland. Since then, I have received over  
9 300 hours of instruction specific to controlled substance and financial investigations.

10         3. I am responsible for investigations involving specified unlawful activities,  
11 to include the distribution of methamphetamine, heroin, and cocaine in the Western  
12 District of Washington. I am also responsible for enforcing federal narcotics laws and  
13 related statutes in the Western District of Washington. I received training on the proper  
14 investigative techniques for these violations, including the use of confidential sources,  
15 undercover agents/officers, the identification of drug trafficking organizations and  
16 identifying the movement of narcotics and narcotic proceeds to and from Western  
17 Washington. I have actively participated in investigations of criminal activity, including  
18 but not limited to crimes against persons, crimes against property, and narcotics-related  
19 crimes. During these investigations, I have also participated in the execution of search  
20 warrants and the seizure of evidence indicating the commission of criminal violations. As  
21 a law enforcement officer, I have testified under oath, attested to applications in support  
22 of search and arrest warrants, and obtained electronic monitoring orders. I have also  
23 assisted with several Title III (i.e., wiretap) investigations during my time as a DEA TFO.  
24 During those wiretap investigations, I have worked in the wire room where I have gained  
25 experience with minimization and evidence gathering from this type of investigation.

26         4. I have obtained the facts set forth in this declaration through my personal  
27 participation in the investigation described below; from oral and written reports of other  
28 law enforcement officers; from witnesses and informants cooperating with law

1 enforcement; and from records, documents and other evidence obtained during this  
2 investigation. I have obtained and read official reports prepared by law enforcement  
3 officers participating in this investigation and in other investigations.

4 5. I make this declaration in support of a motion for entry of a protective order  
5 that would allow the United States to maintain custody of, or otherwise restrain, \$1,500  
6 in United States currency seized from Defendant Ruth Gomez-Marentes's residence in  
7 Kent, Washington ("the 100th Ave. SE Residence"), on July 28, 2020, (the "Subject  
8 Currency") pending resolution of this criminal case.

9 6. On July 28, 2020, law enforcement executed a search warrant (the  
10 "Warrant")—MJ20-458 (5) in the U.S. District Court for the Western District of  
11 Washington—at the 100<sup>th</sup> Ave. SE Residence. Surveillance and mail cover returns  
12 established that Defendant Gomez-Marentes was residing at that location for a period of  
13 time before execution of the Warrant. The Court issued the Warrant on the grounds that  
14 there was probable cause to believe that the 100th Ave. SE Residence, and others  
15 identified in the underlying investigation, contained proceeds and/or facilitating property  
16 of drug trafficking and conspiracy to distribute drugs, in violation of 21 U.S.C.  
17 §§ 841(a)(1), (b)(1)(A)-(C), and 846, among other offenses.

18 7. During the search, law enforcement located the Subject Currency in the  
19 bedroom of Defendant Ruth Gomez-Marentes, as confirmed by third-party resident  
20 "R.M.G." Law enforcement aggregated the Subject Currency with other currency also  
21 located in the bedroom. The aggregated currency—which was found in envelopes, shoe  
22 boxes, and a purse—totaled \$9,245.

23 8. Defendant Ruth Gomez-Marentes was not present at the 100<sup>th</sup> Ave. SE  
24 Residence during the search. Accordingly, law enforcement briefly interviewed R.M.G.,  
25 who estimated that there was approximately \$2,000 in currency located in the bedroom.  
26 R.M.G. further stated that some of the money was from flooring work, and some of the  
27 money was for rent. Law enforcement asked R.M.G. how much of the money belonged to  
28 Defendant Ruth Gomez-Marentes, and R.M.G. estimated \$1,400 in response. Law

1 enforcement seized all \$9,245 as suspected drug proceeds and informed R.M.G. it was  
2 doing so.

3 9. At the time of the seizure, Defendant Ruth Gomez-Marentes did not appear  
4 to have any legitimate income. In an interview with law enforcement on July 28, 2020,  
5 the defendant admitted that her brother, Co-Defendant Alan Gomez-Marentes, had a  
6 debit card linked to her Wells Fargo bank account. The defendant further admitted that  
7 her brother would frequently make cash deposits to her account; that she believed such  
8 deposits comprised proceeds from the distribution of controlled substances; and that all  
9 cash deposits made to her account were conducted by her brother. Over a thirteen-month  
10 period, approximately \$72,000 in funds passed through Defendant Ruth Gomez-  
11 Marentes' account. Of those funds, approximately \$52,210 were in the form of cash  
12 deposits—all of which the defendant admitted represented drug trafficking proceeds. The  
13 remaining deposits did not follow any discernable pattern, and law enforcement could not  
14 identify any regular employment deposits.

15 10. Defendant Ruth Gomez-Marentes was actively involved in the drug  
16 trafficking organization ("DTO") under investigation in this criminal case. She has  
17 participated in both the trafficking and distribution of controlled substances, as well as  
18 the laundering of proceeds. For example, law enforcement intercepted multiple  
19 conversations between Defendant Ruth Gomez-Marentes and her brother, Co-Defendant  
20 Alan Gomez-Marentes, between October 25 and 27, 2019, which indicated the DTO  
21 brought a new shipment of liquid methamphetamine into Western Washington concealed  
22 within candles. Intercepted communications further indicated that Defendant Ruth  
23 Gomez-Marentes physically drove the shipment to Washington from California. Other  
24 intercepted calls between Defendants Alan Gomez-Marentes and Ruth Gomez-Marentes  
25 appeared to involve discussions of the nuances of money laundering. For example, during  
26 an intercepted call on October 28, 2019, Defendant Ruth Gomez-Marentes explained to  
27 her brother that she had moved \$30,000 from Texas to Washington by using her  
28 grandfather to make the deposit.

11. After seizing the Subject Currency, DEA initiated administrative forfeiture proceedings against the Subject Currency pursuant to 18 U.S.C. § 983 (governing non-judicial forfeiture). R.M.G. filed a claim on March 24, 2021 to all \$9,245 seized from the 100<sup>th</sup> Ave. SE Residence during the search (the "Claim"), which DEA referred to the United States Attorney's Office for judicial forfeiture.

12. In the Claim, R.M.G. stated that the money was taken from R.M.G.'s bedroom; that \$7,745.00 of the seized currency belonged to R.M.G. and R.M.G.'s partner ("J.E.M."); and that there was an envelope with Defendant Ruth Gomez-Marentes' name on it containing \$1,500, which belonged to the defendant. *Id.* R.M.G. further stated in the administrative claim that R.M.G. was not sure if R.M.G. could claim the Subject Currency—the \$1,500 contained in the envelope belonging to the defendant. *Id.*

13. R.M.G. attached bank records to the administrative claim purporting to show the legitimate source of the seized currency. The records appear to comprise excerpts of bank statements for an account held in the name of J.E.M. and J.E.M.'s business. Those statements further appear to show currency withdrawals totaling approximately \$9,900 between June 1 and July 20, 2020.

14. The Subject Currency is in the custody of the United States Marshals Service.

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 15<sup>th</sup> day of July, 2021, in Tacoma, Washington.

  
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LUKE A. BRANDEBERRY  
DEA Task Force Officer